

REMARKS

Claims 1-12 are pending. Claims 1-12 stand rejected

Claims 1, 5-9, and 12 have been amended. No new matter has been added.

Claim 12 is objected to because “claim 12 is incomplete. It ends in a comma instead of a period ... The two “wherein clauses do not lead to a grammatically correct sentence.”

Applicant, through his attorney, wishes to thank the examiner for his observation regarding the form of this claim and has amended claim 12 to more clearly state the invention.

Having amended claim 12 to remove the objected to language, applicant submits that the examiner’s reason for objecting to this claim has been overcome and the objection is no longer sustainable. Applicant respectfully requests that the objection be withdrawn.

Claims 1 to 6, 8 and 10-12 have been rejected pursuant to 35 USC 102(a) as being anticipated by Klakow (“Selecting Articles from the Language Model Training Corpus.”) It is the examiner’s position that Klakow discloses each and every element of the subject matter claimed.

A claim is anticipated only if each and every element recited therein is expressly or inherently described in a single prior art reference. Applicant respectfully disagrees with, and explicitly traverses, the examiner’s reasons for rejecting the claims. However, in the interest of advancing the prosecution of this matter, applicant has elected to amend independent claims 1, 7, 8, and 9 to more clearly state the invention. More specifically, the claims have been amended to state that the process is terminated when “a predefined criterion achieves a substantially minimum value.” Support for this amendment may be found in page 4, line 31 of the instant application.

With regard to independent claim 1, this claim, as amended, recites:

A method of generating a language model for a speech recognition system,

wherein a first text corpus is gradually reduced by one or various text corpus parts in dependence on text data of an application-specific second text corpus until a final text corpus is obtained from iterations of reductions of the first text corpus according to predefined criterion achieving a substantially minimum value, and

in that the values of the language model are generated on the basis of the final text corpus.

Klakow, as read by applicant, evaluates methods for selecting articles from a huge training corpus to form a good training corpus for a task described by a target test. Klakow evaluates unigram selection criteria and bigram selection criteria with regard to one-pass reduction and iterative reduction. However, Kalkow fails to teach that the iterative reduction of the first text corpus continues until “a predefined criterion achieves a substantially minimum value,” as is recited in claim 1.

Having shown claim 1, as amended, includes claimed subject matter **not** found in the reference cited, applicant submits that claim 1 is patentably distinguishable over the prior art. Applicant respectfully submits that the reason for the examiner’s rejection of the claim has been overcome and the rejection can no longer be sustained. Applicants respectfully requests reconsideration, withdrawal of the rejection and allowance of the claim.

With regard to claims 2-6, these claims ultimately depend from claim 1, which has been shown to be allowable. Accordingly, claims 2-6 are also allowable by virtue of their dependency upon an allowable base claim.

With regard to claim 8, the examiner rejected this claim citing the same reference in rejecting claim 1. Hence, the applicant's remarks made in response to the examiner's rejection of claim 1 are also applicable in response to the examiner's rejection of claim 1. In view of the amendments made to claim 8, which are similar to those made with regard to claim 1, and the remarks made with regard to the rejection of claim 1, which are

repeated herein in response to the rejection of claim 8, applicant submits that the examiner's reason for rejecting claim 8 can no longer be sustained. Applicant respectfully requests reconsideration, withdrawal of the rejection and allowance of the claim.

With regard to claims 10-12, these claims recite systems that implement the methods recited in claims 1 and 8. As the examiner has rejected these claims citing the same reference used in rejecting claims 1 and 8, the applicant's remarks made in response to the examiner's rejection of claims 1 and 8 are also applicable in response to the examiner's rejection of claims 10-12. Accordingly, in view of the remarks made with regard to the rejection of claims 1 and 8, which are repeated herein in response to the rejection of claims 10-12, applicant submits that the examiner's reasons for rejecting claims 10-12 have been overcome and the rejection can no longer be sustained. Applicant respectfully requests reconsideration, withdrawal of the rejection and allowance of the claims.

Claims 7, 9 and 12 have been rejected pursuant to 35 USC 102(e) as being anticipated by Ramaswamy (USP No. 6,188,976). It is the examiner's position that Ramaswamy discloses each and every element of the subject matter claimed.

With regard to claim 7, this claim recites:

7. A method of generating a language model for a speech recognition system wherein a text corpus part of a given first text corpus is gradually extended by one or various other text corpus parts of the first text corpus in dependence on text data of an application-specific text corpus to form a second text corpus that is iteratively extended until a predefined criterion achieves a substantially minimum value and in that the values of the language model are generated while the second text corpus from the last iteration is used.

Ramaswamy, as read by applicant, discloses a method and apparatus for building a domain-specific language model. The process may be repeated iteratively until the

language model is of satisfactory quality. In the process taught by Ramaswamy “[l]inguistic units … are extracted and … [until] a sufficient number … have been extracted… The number … can be either a predetermined fixed number or a number that dynamically varies with each language model building iteration.... Once, the model has been updated, its quality is evaluated.... If the quality is deemed unacceptable, another language building iteration … is performed.” (col. 3, lines 45-60). Ramaswamy fails to disclose that the iterative steps “are extended until a predefined criterion achieves a substantially minimum value,” as is recited in the claim. Rather Ramaswamy requires two criteria, a number of extractions and a satisfactory quality, i.e., higher quality than previous iteration. Accordingly, Ramaswamy cannot be said to anticipate claim 7 because Ramaswamy does not disclose each and every element claimed.

Having shown claim 7, as amended, includes claimed subject matter not found in the reference cited, applicant submits that claim 1 is patentably distinguishable over the cited prior art. Applicant respectfully submits that the reason for the examiner’s rejection of the claim has been overcome and the rejection can no longer be sustained. Applicants respectfully requests reconsideration, withdrawal of the rejection and allowance of the claim.

Claims 1, 2, 5/1, 5/2, 6/5/1, 6/5/2, 8, 10 and 11 are rejected pursuant 35 USC 103(a) as being unpatentable over Ramasamy in view of Bandara.

A claimed invention is *prima facie* obvious when three basic criteria are met. First, there must be some suggestion or motivation, either in the reference themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the teachings therein. Second, there must be a reasonable expectation of success. And, third, the prior art reference or combined references must teach or suggest **all** the claim limitations.

Applicant respectfully disagrees with, and explicitly traverses the examiner’s reasons for rejecting the claims because the present invention is not obvious in view of references cited. Ramaswamy in combination with Bandara fails to disclose or suggest all the elements of base claims 1 or 8, as the combination fails to disclose or suggest the

claimed invention. For example, Ramaswamy discloses that a reference language model is generated based on a small seed corpus containing linguistic units relevant to the domain (see for example, Abstract) and Bandara discusses the contents of a language model with respect to an acoustic distance. However, the combination of references fails to disclose or suggest all of the elements recited in claims 1 and 8.

Having shown that the combination of Ramaswamy and Bandara fails to disclose does not include all the elements of the present invention, applicant submits that the reasons for the examiner's rejections of the claims have been overcome and can no longer be sustained. Applicant respectfully requests reconsideration, withdrawal of the rejection and allowance of the claims.

Claims 3, 4, 5/3, 5/4, 6/5/3 and 6/5/4 stand rejected under 35 U.S.C. § 103(a) over Ramaswamy in view of Bandara as applied to claims 1 and 2, and further in view of Klakow. Applicants respectfully traverse this ground of rejection.

In addition, it is respectfully submitted that the combination of Ramaswamy, Bandara and Klakow are not combinable, and assuming *arguendo*, would not disclose or suggest the claimed invention even if they were. For example, the combination shows that Ramaswamy discloses generating a language model based on a seed corpus relevant to a domain, whereas Klakow discloses selecting articles from a training corpus. Bandara allegedly discloses adapting a size of a language model to an acoustic distance. It is respectfully submitted that none of the instant claims would have been obvious to a person of ordinary skill in the art at the time of invention with knowledge of the combination of applied references.

Notwithstanding the amendments and made remarks herein, applicant reserves the right to submit an English translation of the German application no. 10014337.7, which applicant claims the benefit of its earlier filing date, to overcome the examiner's reasons for rejecting the claims.

Having addressed the examiner's objections and rejections under 35 USC §§ 102, 103, applicant submits that for the amendments and remarks made herein the reasons for

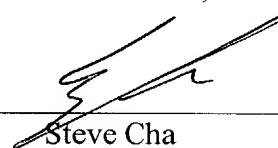
the examiner's rejections have been overcome and can no longer be sustained. Applicant respectfully requests reconsideration, withdrawal of the rejections and the issuance of a Notice of Allowance.

Should any unresolved issues remain that the examiner believes may be resolved via a telephone call, the examiner is invited to call applicant's attorney at the telephone number below.

No fees are believed necessary for the filing of this Amendment and Response.

Respectfully submitted,

Dan Piotrowski
Registration No. 42,079

By: 
Steve Cha
Attorney for Applicant
Registration No. 44,069

Date: September 7, 2004

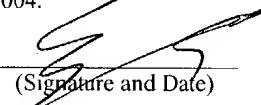
Mail all correspondence to:

Dan Piotrowski, Registration No. 42,079
US PHILIPS CORPORATION
P.O. Box 3001
Briarcliff Manor, NY 10510-8001
Phone: (914) 333-9624
Fax: (914) 332-0615

Certificate of Mailing Under 37 CFR 1.8

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to MAIL STOP, COMMISSIONER FOR PATENTS, P.O. BOX 1450, ALEXANDRIA, VA. 22313 on September 7, 2004.

Steve Cha, Reg. No. 44,069
(Name of Registered Rep.)


(Signature and Date)